

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

Civ. Action No. 14-00029-AB

**REQUEST OF CO-CLASS COUNSEL THE LOCKS LAW FIRM
FOR AN EXTENSION OF TIME TO RESPOND
TO MOTION TO DETERMINE PROPER ADMINISTRATION OF CLAIMS**

As Co-Class Counsel in this case, The Locks Law Firm respectfully requests an extension of time until on or before September 28, 2017 to respond to the Motion to Determine Proper Administration of Claims Under the Settlement Agreement (document no. 8267) (hereinafter "Motion").

The basis for this request is as follows:

1. As Co-Class Counsel, The Locks Law Firm, and individually Gene Locks and David Langfitt, have an absolute duty to the entire Settlement Class as a whole to effectuate and implement the Settlement Agreement and its ongoing administration in a fair, adequate and reasonable manner. This is the firm's and the attorneys' duties under the ongoing jurisdiction and supervision of the Court. *See* Section 28.1 of the Amended Settlement Agreement.

2. In the six month period after the registration period began on February 6, 2017, The Locks Law Firm has registered more than 1100 former players for the Settlement.

3. From March 23, 2017, when the Settlement Fund began accepting claims, until the present, on information and belief, The Locks Law Firm filed more claims than any other Class Counsel or any member of the Plaintiff Steering Committee in the MDL proceedings.

4. As of the date of this filing, on information and belief, The Locks Law Firm has received more notices of "deficiencies" and more Notices of Monetary Awards than any other Class Counsel or any member of the Plaintiff Steering Committee in the MDL proceedings.

5. For these reasons, The Locks Law Firm has a greater breadth of experience and knowledge of the claims process, the basis for alleged deficiencies, and the basis for the specific alleged deficiency identified in the Motion than any other Class Counsel or member of the Plaintiffs' Steering Committee in the MDL.

6. By Order dated August 25, 2017, the Court granted extensions of time until September 28 to the National Football League, NFL Properties, LLC, and Co-Lead Class Counsel to file a response to the pending Motion.

7. In light of the duties of Class Counsel under Section 28.1 and in light of the knowledge and experience of The Locks Law Firm in the claim development, submission, and assessment process to date, the undersigned respectfully requests:

- a. an opportunity to be heard at any hearing on the Motion; and
- b. an extension of time until September 28 to respond in writing to the pending

Motion, so that The Locks Law Firm can impart independently to the Court its experience and knowledge with regard to the issues raised in the Motion.

8. Although Co-Lead Counsel has some experience in addressing the issues that arise with claims, The Locks Law Firm has a unique perspective within the claims process that the undersigned would like to impart to the Court to fulfill the ongoing duty of Class Counsel set forth in section 28.1 of the Settlement Agreement.

Respectfully submitted,

/s/ Gene Locks
Gene Locks
David D. Langfitt
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CERTIFICATE OF SERVICE

I hereby certify that on this date a true and correct copy of the foregoing Request of Co-Class Counsel The Locks Law Firm for an Extension of Time to Respond to Motion to Determine Proper Administration of Claims was served via the Electronic Filing System to all counsel of record in Case No. 2:12-md-02323-AB, MDL No. 2323.

DATE: August 29, 2017

/s/ Gene Locks

Gene Locks, Class Counsel